



SUPPLIER **CODE** **OF CONDUCT**



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Dear Supplier,

This Supplier Code of Conduct reflects our values, beliefs and ethical principles, which guide our actions every day.

To ensure these principles are upheld throughout our supply chain, we have summarised our expectations of suppliers in this Supplier Code of Conduct. It provides a clear framework for responsible, lawful and ethical behaviour.



1 POLICY OVERVIEW & OBJECTIVE

Tentamus Group GmbH (hereafter 'Tentamus') and its companies operate in many markets and countries throughout the world. In all instances, we respect national laws and any other laws with international reach, such as the UK Bribery Act, the US Foreign Corrupt Practices Act and the UK Modern Slavery Act, as well as relevant industry codes of conduct. We are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

We expect all our suppliers to use appropriate systems to facilitate and monitor compliance with these standards, and adherence to local and applicable international laws.

We expect our suppliers to demonstrate their commitment to the principles of this Code and to maintain an ongoing risk management process to identify the environmental, health and safety, labour practices and ethics risks associated with their operations.

Suppliers should encourage staff to report concerns without fear of threats or reprisals, and take appropriate action as required.

Suppliers should put in place equivalent standards to this Code for their own supply chain.

2 SCOPE OF APPLICATION

This Supplier Code of Conduct applies to all suppliers, service providers and business partners who deliver goods or services to any entity within Tentamus. This includes:

- Direct suppliers providing raw materials, products, or services.
- Indirect suppliers involved in subcontracting or secondary services.
- Agents, intermediaries, and consultants acting on behalf of suppliers in any capacity.

Suppliers are responsible for ensuring that these principles are communicated, understood, and implemented throughout their own supply chains.

3 LEGAL COMPLIANCE

Suppliers must comply with all applicable national and international laws and regulations, including but not limited to:

- **Commercial and Civil Law:** Ensure all business activities align with national legal standards.
- **German Supply Chain Act (LkSG):** Establish measures to respect human rights and prevent environmental harm across supply chains.
- **Sanction regimes with jurisdiction and trade controls:** Suppliers (and those within their supply chain) must follow all relevant sanctions regimes (e.g., United Nations, EU and OFAC sanctions) and avoid any dealings with restricted countries, individuals or entities. They are expected to maintain effective internal controls to ensure ongoing compliance across their supply chain. If a supplier becomes subject to any sanctions list, it must report this to Tentamus immediately.

4 HUMAN RIGHTS AND LABOR STANDARDS

At Tentamus, we value respectful behaviour and comply with anti-discrimination law. We do not tolerate any form of discrimination, harassment or unfair treatment. This applies to all situations in the workplace, from recruitment and evaluation processes through to interpersonal relationships between employees. Likewise, suppliers must uphold and commit to internationally recognised human rights as outlined in the United Nations Guiding Principles on Business and Human Rights and ensure compliance with labour standards, including:

- Prohibition of forced, bonded, or child labour.

Employment must be freely chosen; forced or bonded labour, or any other form of modern slavery, must not be used. Workers must not be forced to submit passports or government-issued identity documents as a condition of employment. Child labour must not be used.

- Non-discrimination in employment and promotion, and respect for employees.

Suppliers to Tentamus are required to maintain a workplace that upholds dignity and respect and prohibits harassment or unlawful discrimination in any form. There must be no inhumane treatment of workers, including sexual harassment, sexual abuse, corporal punishment, physical coercion or verbal abuse. Employment decisions



should be based solely on merit, qualifications and performance. Suppliers should implement clear policies and training programmes to foster a respectful working environment and prevent harassment.

- Fair wages and safe working conditions.

Compensation paid to workers must comply with all applicable wage laws. Work weeks must not exceed the maximum set by local law. In addition, Tentamus expects its suppliers to create and foster safe working conditions for all workers. Exposure to physical hazards must be eliminated wherever possible or, where this is not possible, controlled. Tentamus suppliers should implement robust health and safety policies, conduct regular risk assessments, and provide appropriate protective equipment and training. Suppliers must have adequate procedures in place to handle emergencies that may affect workers, and systems must be in place to manage, track and report occupational injuries and illnesses.

- Freedom of association.

Suppliers shall respect the rights of all workers to freely form or join organisations of their choosing, including trade unions, and to engage in collective bargaining in line with applicable national legislation. Employees must be able to participate in such activities without intimidation, interference or retaliation. Where legal restrictions exist, suppliers shall offer alternative, lawful means for workers to voice concerns and be represented.

- Grievance mechanisms.

Suppliers are expected to maintain an accessible and transparent grievance mechanism that enables employees, workers in the supply chain, and other affected stakeholders to raise concerns confidentially or anonymously, where legally permissible, without fear of retaliation. Reported concerns must be investigated in a timely and fair manner.

5 ENVIRONMENTAL RESPONSIBILITY

At Tentamus, we protect the environment, use natural resources sparingly, and avoid or reduce adverse impacts on people and nature. Likewise, we expect suppliers to comply with all relevant environmental laws, regulations and standards in every location where they operate. This includes securing and maintaining all relevant environmental authorisations, including for waste and emissions.

Suppliers must implement environmentally responsible practices, including:

- Reducing emissions, waste, and resource consumption.

Suppliers are expected to actively minimise their environmental footprint by implementing measures to reduce greenhouse gas emissions, energy consumption and water usage throughout their operations. Waste management practices should prioritise reduction, reuse and recycling wherever possible. Suppliers should adopt efficient production processes, invest in cleaner technologies, and monitor their environmental performance regularly. Continuous improvement programmes aimed at these aspects are strongly encouraged.

- Avoiding the use of hazardous materials.

Suppliers must avoid the use of substances that pose significant risks to human health or the environment. Where hazardous materials are unavoidable, suppliers must ensure proper handling, storage and disposal in compliance with applicable safety standards as well as implement robust controls to prevent contamination or accidental release. They should maintain accurate documentation of chemical usage and provide adequate training and protective equipment to employees. Substitution of hazardous substances with safer alternatives should be pursued whenever feasible.



6 BUSINESS ETHICS

At Tentamus, we embed a culture of transparency, integrity and ethical business conduct across all operations, ensuring compliance and stakeholder trust. We expect suppliers to follow ethical and compliant business practices, including:

- Zero tolerance for corruption, bribery, and unfair competition.

Suppliers must conduct all business activities with integrity and in full compliance with applicable national anti-bribery and anti-corruption laws. Any form of bribery, facilitation payments, kickbacks or improper advantages is strictly prohibited. Suppliers must also avoid anti-competitive practices, including price-fixing, bid rigging or market allocation agreements. All interactions with public officials, customers and third parties should be transparent and lawful, and suppliers should implement internal controls and training programmes to prevent unethical conduct.

- Transparent and truthful communication in all business dealings.

Suppliers are expected to maintain honesty and transparency in every aspect of their business relationship. This includes providing accurate information in contracts, invoices, certifications and reports, and never engaging in fraudulent or misleading practices. Suppliers must disclose any conflicts of interest and communicate openly about potential risks or compliance issues. Records and financial statements should be complete, accurate and available for audit when required.

- Conflict of interest.

Suppliers must avoid any actual or perceived conflict of interest in their dealings with Tentamus. Any personal, financial, or other relationship that could influence, or appear to influence, business decisions must be disclosed to Tentamus without delay. This includes family or close personal connections to Tentamus employees, or any situation that could compromise objective and fair cooperation. Suppliers are expected to have appropriate measures in place to prevent and address such conflicts.

- Confidential information.

Suppliers must protect all confidential information and personal data received from, or relating to, Tentamus, its employees, partners and customers. Such information may only be used for legitimate business purposes and must be safeguarded against unauthorised access,

disclosure, loss or misuse. Suppliers are required to comply with all applicable data protection laws and maintain appropriate systems and controls to ensure the secure handling, storage and transfer of confidential and personal data. Any actual or suspected breach affecting Tentamus information must be reported to Tentamus without delay.

7 TRANSPARENCY AND REPORTING

Suppliers are required to submit:

- Data on request about purchased items in the specified format provided by Tentamus. This includes details such as order volume, material data, delivery status and applied pricing.
- Sustainability-related data, including information on emissions, resource efficiency, and social impact.

8 MONITORING AND AUDITS

Tentamus reserves the right to monitor compliance through:

- Regular assessments and audits of supplier facilities and documentation.
- Independent third-party evaluations, if necessary.

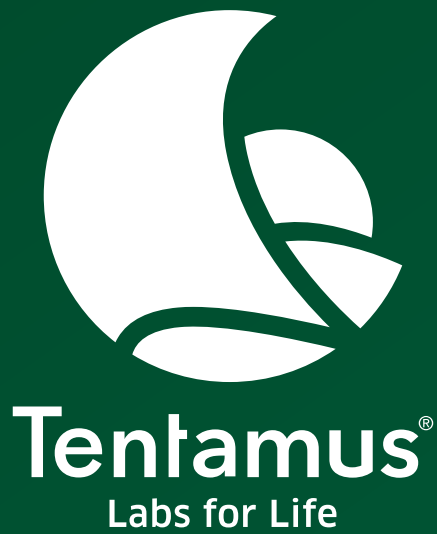
9 NON-COMPLIANCE

Suppliers found to be in breach of this Supplier Code of Conduct may face consequences, including but not limited to:

- Written warnings and corrective action plans.
- Termination of business relationships for repeated or severe breaches.

10 ACKNOWLEDGMENT

We acknowledge that we adhere to the Tentamus Supplier Code of Conduct. If we become aware of any breaches, particularly in respect of bribery or inappropriate gifts or services to or from your organisation or any other third party, or in respect of other matters that could harm the Tentamus' reputation directly or by association, we will inform you immediately.



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